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November 17, 2022

By ECF

Hon. George B. Daniels
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

SO ORDERED

NOV 21 2022

George B. Daniels
GEORGE B. DANIELS
UNITED STATES DISTRICT JUDGE

Re: United States v. Karlos Alberto De La Puerta Rodriguez
18 Cr. 782 (GBD)

Dear Judge Daniels:

I represent Mr. De La Puerta Rodriguez in the above-named matter. I write without objection from the government, by AUSA Gillian Grossman, and Pretrial Services Officer Ashley Cosme to request a temporary modification of my client's bond conditions to permit him to travel with his son to Disneyland on December 1, 2022.

Mr. De La Puerta Rodriguez is on pretrial release in the Southern District of California and subject to conditions that include a curfew and electronic monitoring. He respectfully requests a temporary modification of his bond conditions to permit him to accompany his son on a school trip to Disneyland in Anaheim, California, which is located in the Central District of California. As the Court may be aware from our previous applications, Mr. De La Puerta Rodriguez is the primary caretaker of his autistic son, and his presence is needed in order for his son to attend the trip. A similar request was approved by the Court on April 18, 2022 (ECF Dkt. 112). If this application is granted, Mr. De La Puerta Rodriguez will provide his Pretrial Services Officer in California with all of the necessary information prior to his trip.

If the Court has any questions regarding this application, please do not hesitate to contact me.

Respectfully submitted,
/s/
David Stern

cc: AUSA Kyle Wirshba, AUSA Gillian Grossman (by ECF)